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ATTORNEYS FOR
SCOTT M. SEIDEL, TRUSTEE

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

In re:	§	
	§	Chapter 7
GOODMAN NETWORKS, INC.,	§	
	§	Case No. 22-31641-mvl-7
Debtor.	§	

**TRUSTEE’S MOTION FOR EXPEDITED HEARING ON
TRUSTEE’S MOTION FOR ORDER APPROVING MEDIATION
AND AUTHORIZING PAYMENT OF MEDIATION COSTS**

TO THE HONORABLE MICHELLE V. LARSON, U.S. BANKRUPTCY JUDGE:

COMES NOW Scott M. Seidel (the “Trustee”), the duly-appointed trustee for the estate (the “Estate”) of Goodman Networks, Inc. (the “Debtor”) in the above-styled bankruptcy case (the “Bankruptcy Case”) and files this *Motion for Expedited Hearing on Trustee’s Motion for Order Approving Mediation and Authorizing Payment of Mediation Costs* (the “Motion”), respectfully stating as follows:

1. Concurrently herewith, the Trustee has filed his *Trustee’s Expedited Motion for Order Approving Mediation and Authorizing Payment of Mediation Costs* (the “Underlying Motion”). As explained therein, the Trustee, FedEx Supply Chain Logistics and Electronics, Inc. (“FedEx”), and other stakeholders have agreed to mediation including as to issues raised in adversary proceeding number 23-03091 (the “Adversary Proceeding”).

2. By this Motion, the Trustee requests an expedited hearing on the Underlying Motion on or before January 22, 2024. Grounds to expedite the Underlying Motion exist. The Mediation is currently scheduled for January 23, 2024. The Mediator has agreed to take the case; however, to avoid any potential complications, the Trustee wishes to receive Court approval for the payment of mediation costs prior to the commencement of the Mediation. Accordingly, an expedited hearing on the Underlying Motion would allow the parties to move forward with the mediation unimpeded.

3. The Trustee further submits that an expedited hearing will not prejudice any party. The proposed Mediation is standard alternative dispute resolution and seeks to potentially avoid a costly court fight. Mediation is in the best interest of the Estate. The basis of the Underlying Motion is limited to the approval of the mediation and payment of the associated costs. The Underlying Motion is likely to be unopposed and should take fifteen (15) minutes or less to hear.

WHEREFORE, PREMISES CONSIDERED, the Trustee respectfully requests that the Court set the Underlying Motion for an expedited hearing on or before January 22, 2024.

RESPECTFULLY SUBMITTED this 11th day of January, 2024.

MUNSCH HARDT KOPF & HARR, P.C.

By: /s/ Thomas Berghman
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CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that he conferred with counsel for the major creditors in this case, FedEx, ARRIS Solutions, Inc., and the Bondholders, to discuss the relief requested herein. As of the filing hereof, FedEx and the Bondholders responded to a January 11, 2024 conference request that neither party is opposed to expedited consideration, and no response has yet been received from ARRIS.

By: /s/ Thomas Berghman
Thomas D. Berghman

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this the 11th day of January, 2024, true and correct copies of this document were served by the Court's ECF system on parties entitled to notice thereof and that, additionally, on the same day he caused a true and correct copy of this document to be served by U.S. first class mail, postage prepaid, on the parties listed on the attached service list.

By: /s/ Conor White
Conor White